

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

METROPOLITAN TRANSPORTATION  
AUTHORITY and TRIBOROUGH BRIDGE  
AND TUNNEL AUTHORITY,

Plaintiffs,

and

RIDERS ALLIANCE and SIERRA CLUB, NEW  
YORK STATE DEPARTMENT OF  
TRANSPORTATION, and NEW YORK CITY  
DEPARTMENT OF TRANSPORTATION,

Intervenor-Plaintiffs,

v.

SEAN DUFFY, in his official capacity as  
Secretary of the United States Department of  
Transportation, GLORIA M. SHEPHERD, in her  
official capacity as Executive Director of the  
Federal Highway Administration, UNITED  
STATES DEPARTMENT OF  
TRANSPORTATION, and FEDERAL  
HIGHWAY ADMINISTRATION,

Defendants.

Case No. 1:25-cv-01413-LJL

**NOTICE OF MOTION FOR LEAVE TO FILE *AMICUS CURIAE* BRIEF BY  
504 DEMOCRATIC CLUB, CENTER FOR INDEPENDENCE OF THE DISABLED,  
NEW YORK, ELEVATOR ACTION GROUP, HARLEM INDEPENDENT LIVING  
CENTER, MOBILIZATION FOR JUSTICE, AND NEW YORK LAWYERS FOR THE  
PUBLIC INTEREST**

PLEASE TAKE NOTICE that on such date and time as counsel may be heard, proposed *amici curiae* 504 Democratic Club; Center for Independence of the Disabled, New York; Elevator Action Group; Harlem Independent Living Center; Mobilization for Justice; and New York Lawyers for the Public Interest, (“Proposed Amici”), by and through their undersigned attorneys, shall move before the Honorable Lewis J. Liman for leave to file a brief as *amici curiae* in support of the Plaintiffs and Intervenor-Plaintiffs in this action.

PLEASE TAKE FURTHER NOTICE that Proposed Amici shall rely upon the accompanying Memorandum of Law in support of this motion.

PLEASE TAKE FURTHER NOTICE that all parties (Plaintiffs Metropolitan Transportation Authority, Triborough Bridge and Tunnel Authority, Riders Alliance, Sierra Club, New York State Department of Transportation, and New York City Department of Transportation, and Defendants Sean Duffy, Gloria M. Shepherd, United States Department of Transportation, and Federal Highway Administration) consent to the relief sought in this motion.

Date: May 15, 2025  
New York, NY

/s/ Michael N. Litrownik  
Michael N. Litrownik  
Sebastian Riccardi  
Ellie MacLean  
MOBILIZATION FOR JUSTICE, INC.  
100 William Street, 6th Floor  
New York, New York 10038  
(212) 417-3700  
mlitrownik@mfjlegal.org

Christopher Schuyler  
NEW YORK LAWYERS FOR THE  
PUBLIC INTEREST  
151 West 30th Street, 11th Floor  
New York, NY 10001  
(212) 244-4664  
cschuyler@nylpi.org

Daniel Mullkoff  
WANG HECKER LLP  
305 Broadway, Suite 607  
New York, New York 10007  
(212) 620-2606  
dmullkoff@wanghecker.com

*Counsel for Proposed Amici Curiae*